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February 1, 2006

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: EB-06-TC-060: Certification of CPNI Filing

Dear Ms. Dortch:

Pursuant to the Enforcement Bureau's January 30, 2006, Public Notice, DA 06-223, transmitted herewith for filing with the Commission is Verizon Wireless's most recent compliance certification and accompanying statement of operating procedures to comply with the Commission's rules governing customer proprietary network information (CPNI).

Should you need additional information, please contact the undersigned.

Sincerely,

A handwritten signature in black ink that reads "John T. Scott, III". The signature is written in a cursive, slightly stylized font.

John T. Scott, III

Enclosure

cc: Byron McCoy

Verizon Wireless Certification of Compliance For 2005

Pursuant to Section 64.2009(e) of the Commission's rules, I, John Stratton, Vice President and Chief Marketing Officer, an officer of Verizon Wireless, hereby provide this certification that Verizon Wireless has established operating procedures that are adequate to ensure compliance with the Commission's rules designed to protect customer proprietary network information (CPNI). I certify that I have personal knowledge of these procedures as contained in the separate statement accompanying this certificate.

By: 

Title: Vice President and Chief Marketing Officer

Date: January 27, 2006

Verizon Wireless Statement of Compliance 2005

To ensure compliance with section 222 of the Act and the Commission's implementing rules, Verizon Wireless has established a comprehensive internal CPNI compliance program. The following details this program.

CPNI Compliance Management

Verizon Wireless has a Manager–National Marketing Operations who is responsible for developing, implementing, and overseeing CPNI compliance within Verizon Wireless. Verizon Wireless Regulatory and Legal Departments ensure that this individual has clear direction on compliance responsibilities and the details and proper interpretations of the FCC's CPNI rules. Legal and Regulatory personnel work with this individual on a regular basis to review issues that may arise and to provide advice.

Responsibilities of the Verizon Wireless Manager–National Marketing Operations include:

- Ensuring the ongoing availability and effectiveness of department-specific methods and procedures and job aids for supervisory and non-supervisory personnel covering all marketing/sales job functions within the department;
- Establishing an awareness within the marketing department of the importance and necessity of complying with the CPNI rules, including such programs as CPNI notices, ensuring employees have access to the online CPNI training tool, etc.
- Instituting an ongoing training program for supervisory and non-supervisory personnel, including introductory training for employees that are newly entering the company or the department.
- Performing internal operational reviews at least once a year to evaluate the effectiveness of departmental methods and procedures and compliance guidelines.
- Managing and controlling access to CPNI and dissemination of CPNI within and outside of the department to ensure that CPNI is disclosed only as permitted under the Commission's rules.

Employee Awareness

Consistent with the requirements of 47 C.F.R. § 64.2009(b), Verizon Wireless has an extensive training program that fully informs all employees, including sales and marketing personnel, about the CPNI rules and that careless or intentional disregard of CPNI rules can be the grounds for disciplinary action, up to and including dismissal. Verizon Wireless has a comprehensive "Code of Conduct" that specifically addresses the importance of compliance with CPNI requirements.

Use of CPNI

Pursuant to 47 C.F.R. § 64.2005(a), Verizon Wireless uses CPNI without consent to market services within the "total service" package of services already provided to customers. Verizon Wireless does not use wireless CPNI to market outside the wireless "total service." Pursuant to 47 C.F.R. § 64.2005(a)(1), Verizon Wireless shares CPNI with its affiliates only in those circumstances when both the affiliate and Verizon Wireless provide service to the customer. Consistent with 47 C.F.R. § 64.2005(b), Verizon Wireless does not share wireless CPNI with affiliates that do not already provide service to the customer.

According to 47 C.F.R. § 64.2005(b)(1), Verizon Wireless has the legal right to use CPNI to market the wireless handset and information services. Verizon Wireless uses CPNI to market these services and those services formerly known as "adjunct-to-basic" services defined in 47 C.F.R. § 64.2005(c)(3), including directory assistance, call waiting, and caller ID. Because Verizon Wireless does not use CPNI outside the "total service" subscribed to by its customers, Verizon Wireless is under no obligation under 47 C.F.R. § 64.2007 to seek consent from its customers, and Verizon Wireless therefore does not track whether such consent has been obtained from its customers.

Given that Verizon Wireless does not use CPNI for purposes that would require it to seek consent, Verizon Wireless has not implemented a system to determine the status of a customer's CPNI approval prior to the use of CPNI as required by 47 C.F.R. § 64.2009(a). In compliance with 47 C.F.R. § 67.2009(c), Verizon Wireless has implemented a system to track its marketing and sales campaigns that use CPNI, and records of these campaigns are retained for at least one year. This is a web-generated tool that describes each campaign, the CPNI that was used in the campaign, the date and purpose of the campaign, and what products or services were offered as part of the campaign. In addition, pursuant to 47 C.F.R. § 64.2009(d), all outbound marketing programs are reviewed by regulatory and legal counsel for Verizon Wireless before they are implemented. Sales personnel do not have authority to initiate marketing programs independently from this process.